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SC PUBLIC SERVICE  
COMMISSION

**DOCKET NO. 2014-69-S**

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2           **TESTIMONY IN THIS MATTER?**

3     A.             I am.

5                    **DOCKET?**

6     A.           The purpose of my rebuttal testimony is to respond on behalf of the applicant,  
7           which I will refer to as “PWR” or the "Company," to various issues raised in the direct  
8           testimony of the witnesses for the two intervenors in this case, Corley Construction, LLC,  
9           doing business as Broad River Carwash and Laundry, and Arch Enterprises, LLC, doing  
10          business as McDonalds, and in the direct testimony of Mr. Willie Morgan on behalf of  
11          the Office of Regulatory Staff, which I will refer to as “ORS.”

13 **INTERVENORS DO YOU WISH TO ADDRESS?**

1 A. I will respond to the assertions of Mr. Todd Corley and Mr. Chris Valdes that their  
2 companies are being required to pay a higher percentage increase than residential  
3 customers, that the rate design should be based upon water consumption, and that the use  
4 of Regulation 61-67, Appendix A to set rate equivalencies is improper and results in  
5 unreasonable charges. Further, with respect to the testimony of Mr. Valdes on behalf of  
6 the McDonalds restaurant, I will be addressing his assertion that his company is not  
7 realizing a reduction in its charges as a result of the proposed rates. Finally, I will  
8 comment on a number of the assumptions and assertions made in the testimony of Mr.  
9 Warmath on behalf of both intervenors.

10 Q. WHAT RESPONSE DO YOU HAVE TO THE ASSERTION THAT THE  
11 INTERVENORS ARE BEING SUBJECTED TO HIGHER PERCENTAGE  
12 INCREASES THAN ARE RESIDENTIAL CUSTOMERS?

13 A. Both witnesses are incorrect in stating the proposed increase is “unjust and  
14 unreasonable” because the percentage increase proposed by PWR’s rate application is  
15 higher for their businesses than the percentage increase proposed for residential  
16 customers in this proceeding.

17 With respect to the charges to Arch Enterprises, LLC, the proposed rate schedule  
18 results in a reduction in its charges from \$3,250.90 per month to \$1,170.61 per month. It  
19 is unclear to me how Mr. Valdes arrived at his conclusion that the proposed monthly  
20 charge for his company would become \$1,570 and I therefore attach as RM Rebuttal  
21 Exhibit 1 a calculation of the current and proposed charges for his company. Regardless,  
22 the proposed rate results in a 64% reduction in charges to Arch Enterprises, LLC, and not  
23 an increase.

1           The residential customers' charges for customers served by the Alpine system – as  
2           are both intervenors -- will increase from \$29 per month to \$35.50 per month if the full  
3           relief requested is granted. The charges to Corley Construction LLC, which is also  
4           served by the Alpine system, will increase from \$1,812.50 per month to \$2,218.75 per  
5           month if the full relief requested is granted. The proposed percentage increase to  
6           residential customers served by the Alpine system and to Mr. Corley's company is  
7           therefore exactly the same -- 22.42%. Also, I would note that the proposed increase to  
8           residential customers served by PWR's Woodland system results in an increase of  
9           47.92% to those customers.

10           Mr. Corley and Mr. Valdes both appear to be comparing the proposed rates to the  
11           old rates that were in effect for Alpine Utilities, Inc., which were increased by the  
12           Commission in Docket No. 2012-94-S. This is not an accurate comparison since the  
13           currently approved rates are what the intervenors are required to pay. I would also submit  
14           that the characterization of the percentage increases resulting from the proposed rates by  
15           these intervenor witnesses is particularly inapt where it is indisputable that Arch  
16           Enterprises, LLC will realize a substantial reduction in its monthly charges and where the  
17           expert witness for the intervenors in this proceeding has suggested that a proper monthly  
18           charge for Corley Construction would be \$1,672 per month and not the \$182 that Mr.  
19           Corley uses in his analysis of the percentage increases.

20   **Q. DO YOU AGREE WITH THE ASSERTION OF THE INTERVENORS'**  
21   **WITNESSES THAT THE APPLICATION ITSELF SUPPORTS A RATE DESIGN**  
22   **BASED ON WATER CONSUMPTION?**

1     **A.**           No, I do not. Mr. Corley and Mr. Valdes contend that rates should be designed  
2           based upon water consumption because of language they assert appears in the application  
3           permitting PWR to review customer water usage records in certain circumstances and  
4           thereafter increase customer charges. I believe Mr. Corley's and Mr. Valdes' statements  
5           in this regard refer to Section 11 of the proposed rate schedule. This contention reflects  
6           an incorrect reading of this rate schedule provision as it simply provides another tool that  
7           the utility may use in considering whether a commercial customer's wastewater flow is  
8           exceeding the design flow loadings set out in the DHEC guidelines. Increased water  
9           consumption may support a determination that actual wastewater discharges are  
10          exceeding the design flows or loadings. This contention also fails to recognize that the  
11          approved commercial rates are minimum rates. This section of the proposed rate schedule  
12          does not establish that rates are set based upon water consumption as these witnesses  
13          appear to suggest. I would note further that the contention that water consumption alone  
14          somehow equates to the cost of sewer service also fails to recognize that wastewater  
15          treatment plant design must account for maximum wastewater flow capacity demands  
16          from all types of customers. The relatively higher potential peak demand from  
17          commercial customers creates greater costs and therefore warrants a higher charge. And,  
18          as noted in the rebuttal testimonies of Mr. Walsh and Mr. Sadler on behalf of PWR,  
19          strength of pollutant flow from different customers is also a consideration in determining  
20          rates.

21    **Q.     WHAT COMMENT DO YOU HAVE ON THE CONTENTION OF THE**  
22    **INTERVENORS' WITNESSES THAT UTILIZING APPENDIX A TO**  
23    **REGULATION 61-67 TO SET CUSTOMER EQUIVALENCIES IS IMPROPER?**

1     **A.**           The intervenors' witnesses misunderstand the role Appendix A plays in setting the  
2     rate equivalencies proposed by the application. The contributory loading guidelines set  
3     out in that regulation do not project average or actual customer water consumption or  
4     wastewater discharges. Rather, they establish a construction standard for capacity  
5     required to handle maximum peak demands for various categories of customers. These  
6     relative capacity requirements are used by the Company only as a tool to distribute the  
7     cost of service among the customer base. This concept is discussed further in the rebuttal  
8     testimonies of Mr. Walsh and Mr. Sadler.

9     **Q.     WHAT ARE YOUR COMMENTS REGARDING THE TESTIMONY OF MR.**  
10    **WARMATH?**

11    **A.**           Mr. Warmath suggests that his proposed alternative rate design, which would  
12    establish rate equivalencies using customer water consumption to estimate customer  
13    wastewater discharge, results in just and reasonable rates. Mr. Gary Walsh discusses in  
14    his rebuttal testimony why that is not the case. I agree with Mr. Walsh, but wish to add  
15    another perspective to his comments, which is to consider the reasonableness of the rate  
16    proposed for the intervenors vis-à-vis the rates our residential customers and the  
17    intervenors would be charged if they were customers of the City of Columbia. I have  
18    attached to my testimony as RM Rebuttal Exhibit 2-A the City of Columbia's sewer  
19    service rate ordinance which governs the rates and rate design applicable to customers of  
20    Palmetto of Richland County LLC, or "PRC," that Mr. Warmath mentions in his  
21    testimony. As the Commission is aware, the City's sewer service rate ordinance is  
22    incorporated into the rate schedule that has been approved for PRC. I would note that  
23    since the Commission granted that approval, the City has amended its sewer service rate  
24    ordinance to raise the monthly rate from \$4.93 to \$5.32 per 100 cubic feet of water

1 consumed. I have attached to my testimony as RM Rebuttal Exhibit 2-B a certified true  
2 copy of the City of Columbia's current sewer service rate ordinance. Also, the City  
3 charges a minimum base fee of \$10.20, which is based on the size of the customer's water  
4 meter. Since PRC is only approved to charge the lower monthly service rate, and the size  
5 of the intervenors' water meters is not known to me, my comments that follow assume  
6 the lower rate without including a base fee.

7 A residential customer situated outside the City's territorial limits would have a  
8 monthly bill of \$50.18 based on the AWWA average monthly water consumption of  
9 7,620 gallons mentioned by Mr. Walsh. I would note that this is about 41% more than a  
10 PWR residential customer would be charged under the rate proposed in this proceeding.  
11 By contrast, if the McDonalds restaurant was served by the City of Columbia, its sewer  
12 bill would be \$384.00 based only on its monthly water consumption of 58,272 gallons as  
13 testified to by Mr. Warmath. This is approximately 3% more than the monthly rate that  
14 Mr. Warmath suggests would be reasonable. If the Corley Construction's carwash and  
15 laundromat were served by the City of Columbia, its sewer bill would be \$1,721.87 based  
16 only on its monthly water consumption of 261,250 gallons as testified to by Mr.  
17 Warmath. This is approximately 3% less than the monthly rate that Mr. Warmath  
18 suggests would be reasonable.

19 I believe that these figures illustrate a disconnect that exists between Mr.  
20 Warmath's analysis and the determination of a just and reasonable rate by the  
21 Commission in a ratemaking proceeding involving a public utility such as PWR. Unlike  
22 the City, PWR does not have the ability to generate revenues to support its utility  
23 operations through ad valorem taxation. Nor does PWR have the ability to obtain low  
24 cost funding through bond issues or other municipal financing techniques that are

1 available to governmental utility systems. Similarly, PWR's properties are not tax  
2 exempt like the City's. In fact, PWR's properties are subject to the highest assessment  
3 ratio permitted under South Carolina law, 10.5%. And, PWR does not have the ability to  
4 discriminate within a customer class and charge different rates to residential customers  
5 based upon their geographic location as does the City of Columbia. Yet, under Mr.  
6 Warmath's alternative proposal, a rate design that would result in monthly charges to the  
7 intervenors that are nearly the same as what they would be charged by the closest  
8 governmental utility -- having significant financial advantages and resources unavailable  
9 to PWR -- is asserted to be a more equitable approach.

10 I believe that the foregoing demonstrates that Mr. Warmath's proposed alternative  
11 equivalency rate design is greatly influenced by the fact that his experience is deeply  
12 rooted in performing rate studies for the governing bodies of governmental entities that  
13 are not charged by law with setting just and reasonable rates, have vastly different  
14 considerations in determining rates to be charged their customers, and have at their  
15 disposal greater resources than investor owned utilities such as PWR. This is another  
16 reason why Mr. Warmath's analysis should be rejected by the Commission.

17 **Q. MR. WARMATH ASSERTS THAT THE COST TO TREAT WASTEWATER IS**  
18 **ESSENTIALLY THE SAME FOR MOST CUSTOMERS; DO YOU AGREE**  
19 **WITH THIS ASSERTION?**

20 **A.** No, I do not. Research indicates that restaurant wastewater flow in particular  
21 contains some of the highest levels of biochemical oxygen demand, or "BOD" and fats,  
22 oils, and grease, which we refer to as "FOG" among the various customer classes and  
23 categories due to significantly higher volumes of detergents and grease being introduced  
24 into the collection system through food preparation, cleaning, disinfecting, and dish

1 washing. According to a report made by the City of Scottsdale Arizona in Audit Number  
2 1312, Wastewater Customer Rate Classification Review, which was issued August 9,  
3 2013, “[r]esidential customers have lower impact on the system and are among the lowest  
4 rates, while food service-related classifications are among the highest.” This report can  
5 be found at <http://www.scottsdaleaz.gov/Asset49685.aspx>.

6 As I have discussed in my direct testimony, and as shown in the town hall  
7 presentations attached to my direct testimony, grease is recognized as both costly to the  
8 treatment process and as the major cause of blockages which lead to SSOs.  
9 Notwithstanding oil recycling programs in which restaurants may participate and grease  
10 trap enforcement programs such as that operated by PWR that has previously been  
11 mentioned, restaurants still contribute more FOG to the system than do residential  
12 customers. And, just by the nature of their business operations, laundromats and  
13 carwashes will have a higher concentration of detergent in their wastewater flows than  
14 will residential customers.

15 **Q. WHAT ISSUE IN THE TESTIMONY OF ORS WITNESS MR. MORGAN DO**  
16 **YOU WISH TO ADDRESS?**

17 **A.** The first issue raised by Mr. Morgan that I would like to address pertains to the  
18 number of single family equivalents, or “SFEs,” served by PWR and the impact of that  
19 number on revenues. As noted in Mr. Morgan’s testimony, the Company conducted a  
20 further study of its equivalent residential connections which was completed on July 1,  
21 2014. The purpose of this study was to ascertain the impact of changes in our customer  
22 base that have occurred since the filing of the application in this matter. In the course of  
23 conducting that study, the Company realized that it had made two errors in determining  
24 the number of SFEs that were used in the Application exhibits submitted in this matter. I



1 would therefore like to provide the Commission with the current number of SFEs for both  
2 the test year and on an as-adjusted basis, which number takes into account the correction  
3 of these two errors and the subsequent changes in our customer base. Before I explain the  
4 nature and scope of these errors and address the subsequent changes in certain  
5 commercial customer operations that bear on our SFE counts, I want to offer the  
6 Company's sincere apology to the Commission and ORS for the oversights which led to  
7 these errors.

8 **Q. MR. MELCHER, BEFORE YOU EXPLAIN THE NATURE AND SCOPE OF**  
9 **THESE ERRORS, CAN YOU TELL ME WHETHER THEY PERTAIN TO THE**  
10 **SFE COUNTS OR CHARGES UNDER CURRENT OR PROPOSED RATES FOR**  
11 **EITHER OF THE INTERVENORS?**

12 **A.** No, they do not. While the Company's proposal made by its application to reduce  
13 the equivalency rating for cars served by fast-food restaurants at drive-thru facilities  
14 reduces the SFE counts and charges for Arch Enterprises, LLC, doing business as  
15 McDonalds, the issues raised in Mr. Morgan's testimony do not pertain to it or the other  
16 intervenor, Corley Construction, LLC, doing business as Broad River Carwash and  
17 Laundry.

18 **Q. WHAT IS THE NUMBER OF SFEs AND REVENUE FIGURES SET OUT IN**  
19 **THE APPLICATION?**

20 **A.** The application reflects 9,194.14 average SFEs as of the end of the test year,  
21 which is the twelve months ended December 31, 2013, and 9,108.09 pro-forma adjusted  
22 SFEs. These SFE counts result in test year revenues of \$3,019,700 and pro-forma

1 adjusted revenues of \$3,880,045 as shown in the application and exclusive of growth-  
2 related revenues.

3 **Q. WOULD YOU PLEASE DESCRIBE THE TWO ERRORS YOU HAVE**  
4 **MENTIONED?**

5 **A.** Yes, I will.

6 In the test year SFE counts reflected in the application, the Company included  
7 243.50 SFEs for apartment units served by the Woodland system which were calculated  
8 based upon the equivalency ratings for apartments derived from the Unit Contributory  
9 Loading Guidelines under Appendix A to Regulation 61-67.B, subparts 1-3. However,  
10 under the proposed rate schedule, apartments are included in the residential rate category  
11 and one apartment equals one SFE, which is reflected in the residential multi-family SFE  
12 counts contained in the application. These 243.50 SFEs were incorrectly included in the  
13 test year SFE counts and, as a result of this error, pro forma revenues were overstated by  
14 \$103,731.

15 The second error arose from an improper categorization of 170 multi-family  
16 residential SFEs for the Alpine system as commercial SFEs on the Company's books,  
17 which was known at the time the application was filed. Although these 170 SFEs were  
18 removed from the commercial category for purposes of the test year and the Company's  
19 application in this proceeding, inadvertently they were not added back into the residential  
20 category. As a result of this error, test year commercial revenues were overstated by  
21 \$59,160 and test year multi-family residential revenues were understated by \$59,160,

1 with total test year revenues being unaffected Pro forma revenues were unaffected by  
2 this error.

3 **Q. YOU ALSO MENTIONED A NEED TO RECOGNIZE CHANGES IN THE**  
4 **OPERATIONS OF CERTAIN COMMERCIAL CUSTOMERS SINCE THE**  
5 **APPLICATION WAS FILED; WOULD YOU PLEASE DESCRIBE THESE**  
6 **CHANGES AND THEIR IMPACT ON THE COMPANY'S SFE COUNTS ON A**  
7 **PRO FORMA BASIS?**

8 **A.** Yes. Subsequent to our filing in this matter, several commercial customers served  
9 by the Alpine system have either gone out of business or modified their operations, both  
10 of which warrant adjustments to the commercial customer SFE counts. The most notable  
11 lost customers include the Kroger grocery store which has closed and thus reduces  
12 commercial SFEs by 50.07, a bar and restaurant known as the "Pure Lounge of  
13 Columbia" which closed and thus reduces commercial SFEs by 51.00, and the "24/7  
14 Health and Fitness" exercise facility which closed and results in a reduction of 7.25  
15 commercial SFEs. In terms of modified commercial customer operations warranting a  
16 change in SFE counts, the most notable of these involves certain food service facilities  
17 and operations previously included in the SFE count for the Synergy Business Park  
18 which have been changed and thus reduced its previous SFE count by 59.56. Also, the  
19 fast-food restaurant previously operated by RBF Enterprises, LLC, changed hands in July  
20 of 2013 and a new SFE count based on the number of cars served and seats maintained  
21 by the current owner and operator of that restaurant, intervenor Arch Enterprises, LLC,  
22 was only recently determined and this resulted in a reduction of 24.05 commercial SFEs.  
23 I would note that this latter adjustment is unrelated to the proposed modification to the

1 Company's rate schedule by which the equivalency factor for cars served by drive-thru  
2 facilities is reduced by 75%, from 40 gallons to 10 gallons per car. The SFEs  
3 attributable to the food service operations at the Radisson Hotel were reduced by 15.00 to  
4 reflect ORS's position that "take-out" meals served by restaurants other than walk-up  
5 delicatessens should not be included in equivalency ratings for restaurants. In addition,  
6 the total SFEs attributable to one of the service locations owned by the Jimmy Martin  
7 Realty Group consisting of two bingo halls, were reduced by 29.19 SFEs to account for  
8 two changes in their operations -- the elimination of food service operations and the  
9 addition of seats. The SFEs attributable to our customer Exclusive Bar and Grill were  
10 reduced by 1.70, with a change in seat counts for the bar and restaurant components of  
11 that operation being the primary factors.

12 We have only one commercial customer in the Woodland system, which is an  
13 elementary school. Due to a reduction in the number of students and faculty at this  
14 school, its SFE count is reduced from 47 to 29.55. At the proposed rate of \$35.50, this  
15 17.45 reduction in SFEs will result in a reduction in its monthly bill of \$78.97.

16 **Q. HAVE THERE BEEN ANY ADDITIONS TO THE COMPANY'S COMMERCIAL**  
17 **CUSTOMER BASE SINCE THE RATE FILING WAS MADE?**

18 **A.** Yes. KJ's IGA Market grocery store became a customer and this added 16 SFEs.

19 **Q. TAKING INTO ACCOUNT THE COMPANY'S CORRECTION OF THE TWO**  
20 **ERRORS IN DETERMINING THE NUMBER OF SFEs FOR PURPOSES OF**  
21 **THE APPLICATION, AND THE POST TEST YEAR CHANGES IN THE**  
22 **NUMBER AND TYPES OF CUSTOMERS SERVED THAT YOU HAVE**

1       **DESCRIBED, WHAT IS THE CORRECT NUMBER OF SFEs AND THEIR**  
2       **EFFECT ON REVENUES?**

3    A.       The correct number of average SFEs as of December 31, 2013, was 9,120.64 and  
4       the correct number of pro forma adjusted SFEs is 8,688.82. There is no impact on test  
5       year revenue of correcting the error in the number of SFEs, while the impact of correcting  
6       that error and making the additional pro forma adjustments relating to the loss and  
7       addition of customers reduces pro forma revenue by \$178,609 at the proposed rate of  
8       \$35.50.

9    Q.       **WHAT ARE THE OTHER ISSUES MENTIONED IN MR. MORGAN'S**  
10       **TESTIMONY THAT YOU WOULD LIKE TO ADDRESS?**

11   A.       Mr. Morgan states that PWR failed to pursue collections from commercial  
12       customers on a consistent basis, failed to disconnect commercial customers with past due  
13       balances, did not bill several commercial customers during the test year and allowed one  
14       commercial customer to pay nothing during the test year. Although the statements made  
15       by Mr. Morgan are correct, I would like to offer some context for these facts and explain  
16       the steps PWR is taking to address these deficiencies. I would hasten to note that the  
17       Company's failure to institute timely collections or disconnections – although clearly  
18       undesirable – has not been detrimental to our customers in the context of ratemaking as  
19       our proposed revenues are adjusted by ORS to impute any lost revenue and disallow any  
20       excess uncollectible account percentage resulting from these circumstances.

21   Q.       **WOULD YOU PLEASE DESCRIBE THE CIRCUMSTANCES WHICH**  
22       **PROVIDE THE CONTEXT THAT YOU HAVE MENTIONED?**

1     A.           Yes. At the time the Alpine Utilities and Woodland Utilities systems were  
2                acquired by PWR, no means of disconnection for most service premises existed short of  
3                excavating and then permanently capping the sewer line. Subsequent to our acquisition  
4                of these systems, the Company modified its agreement with its operations contractor to  
5                add a full time, supplemental crew to install elder valves in order to allow disconnection  
6                of service premises for any necessary reason, including non-payment by a customer for  
7                service. In 2013, 312 new elder valves were installed. To date in 2014, 118 elder valves  
8                have been installed and PWR is installing an average of approximately 30 elder valves  
9                per month.

10    Q.     **DOES THE COMPANY'S ELDER VALVE PROGRAM APPLY TO BOTH**  
11            **RESIDENTIAL AND COMMERCIAL CUSTOMERS?**

12    A.           It does, but our focus has been primarily on residential customers rather than  
13                commercial. We find that commercial customers are less likely to move or abandon their  
14                business. In our experience, residential customers are more prone to moving out of a  
15                service premises without requesting a final bill, which often results in an uncollected past  
16                due amount and unoccupied service premises.

17                For commercial customers, our collections efforts have been based more upon  
18                face to face communications and setting up payment plans when necessary. This makes  
19                sense to us since commercial customers with past due balances, as I have already  
20                mentioned, tend to continue in their occupancy of service premises. PWR management  
21                personnel are assigned to call on specific commercial customers based on their high  
22                outstanding balances. We believe that this effort is less costly than the installation of  
23                Elder valves. Where we find that commercial customers have abandoned service

1 premises, we may attempt to collect from the customer entity if it is still in business in  
2 another location.

3 In considering whether an elder valve should be installed at an abandoned  
4 commercial service location, PWR determined that the more financially prudent  
5 approach would often be to not incur the cost of installing an Elder valve as a new  
6 commercial customer would likely eventually move in to the location and set up service.  
7 The Company feels that resources are better spent installing elder valves at occupied  
8 residential service locations as residential customers tend to be more difficult to collect  
9 past due balances from than commercial customers. Also, the number of residential  
10 customer service locations outnumbers the number of commercial customer service  
11 locations by a factor of 6 to 1. However, elder valves have been installed at three of our  
12 Alpine commercial customer premises with particularly large balances. Also, there are  
13 now eight “enhanced” grease traps installed at restaurants in the Company’s service area  
14 which provide PWR the ability to disconnect wastewater service and thereby render  
15 installation of an elder valve unnecessary.

16 **Q. HOW WOULD YOU CHARACTERIZE THE RESULTS OF THE COMPANY’S**  
17 **EFFORTS IN THIS REGARD?**

18 **A.** We believe that our efforts in this regard have produced reasonable, although not  
19 optimal, results. As of May 31, 2014, for commercial customers served by our Alpine  
20 system (1) with an outstanding balance over \$750, which is our internal standard to  
21 implement critical collection efforts, (2) that are still in business, and (3) that are not on a  
22 deferred payment plan with Company, PWR only has four customers that have not been  
23 disconnected.

1 **Q. WOULD YOU PLEASE EXPAND UPON YOUR DESCRIPTION OF THESE**  
2 **FOUR COMMERCIAL CUSTOMERS AND THE CIRCUMSTANCES**  
3 **REGARDING THE STATUS OF THEIR ACCOUNTS?**

4 **A.** Yes. One of these was RBF Enterprises, LLC, which, as the Commission is  
5 aware, is no longer a customer. PWR plans to pursue collection action against this  
6 former customer. Another of these commercial customers is the intervenor Corley  
7 Construction, LLC, which, as the Commission is also aware, has a complaint pending  
8 against the Company which precludes its disconnection under Commission regulations.  
9 A third such commercial customer is a tenant at a shopping center which owes PWR  
10 \$4,453. This shopping center does not have individual service connections for each of its  
11 tenants, but only one service connection for the entire shopping center. To install an  
12 elder valve at this service location and disconnect this commercial customer would  
13 require substantial expense to excavate through a concrete parking lot and perhaps also  
14 require the permission of the landlord. The Company has made the decision that rather  
15 than expending capital in this circumstance, direct discussions with the customer in an  
16 effort to establish a deferred payment program made more sense. The last of these  
17 commercial customers is a laundromat that has an unpaid balance of approximately  
18 \$17,000. After receiving an explanation from the Company regarding the reasons for an  
19 increase in its bill subsequent to the last rate relief order for customers served by the  
20 Alpine system, this customer contacted the Governor's office. PWR representatives were  
21 requested to and did meet with a member of the Governor's staff to discuss the matter.  
22 Thereafter, the customer agreed to a deferred payment plan which it has not honored.  
23 Several attempts to contact the customer have been made without success. Therefore, on  
24 June 30, 2014, a certified letter was sent to the customer giving notice of the Company's



1 intent to disconnect service. If arrangements for payment are not made on or before  
2 August 11, 2014, PWR intends to disconnect this customer location.

3 **Q. WHAT CAUSED THE COMPANY NOT TO BILL CERTAIN COMMERCIAL**  
4 **CUSTOMERS DURING THE TEST YEAR?**

5 **A.** During the test year, certain commercial customers were not paying bills the  
6 Company had issued and it was incorrectly believed that these customers were no longer  
7 in operation. Based on this belief, PWR determined not to continue billing charges that it  
8 thought were likely uncollectible as this would lead to increased costs and related bad  
9 debt expense. During field inspections, PWR discovered that these customers were, in  
10 fact, operating at the service premises. These customers were then added back to the  
11 current billing register. To the extent there are unresolved past due balances for these  
12 customers, the Company will seek to reach deferred payment plan agreements or initiate  
13 disconnection in accordance with the Commission's regulations.

14 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

15 **A.** Yes, it does.

ARCH ENTERPRISES, LLC D/B/A McDONALDS  
CURRENT AND PROPOSED BILL CALCULATIONS

**CURRENT**

Current Rate: \$29 per single family equivalent per month

Current Single Family Equivalents: 112.1

Current Equivalency Factors: Cars – 1,055.

(This car count is based upon the figure provided by Arches, LLC of 26,365 cars per month plus a 20% peaking factor. 1,055 cars X 40 gallons = 42,200 gallons)

Seats – 66 seats X 40 gallons = 2640 gallons.

(This seat count is based upon inspection by PWR)

Equivalency Calculation: 42,200 gallons + 2,640 gallons = 44,840 gallons  
44,840 divided by 400 gallons per SFE = 112.1 SFEs

Monthly Bill: 112.1 SFEs X \$29 = \$3,250.90

**PROPOSED**

Proposed Rate: \$35.50 per single family equivalent per month

Proposed Single Family Equivalents: 32.975

Current Equivalency Factors: Cars – 1,055.

(This car count is based upon the figure provided by Arches, LLC of 26,365 cars per month plus a 20% peaking factor. 1,055 cars X 10 gallons = 10,550 gallons)

Seats – 66 seats X 40 gallons = 2640 gallons.

(This seat count is based upon inspection by PWR)

Equivalency Calculation: 10,550 gallons + 2,640 gallons = 13,190 gallons  
13,190 divided by 400 gallons per SFE = 32.975 SFEs

Monthly Bill: 32.975 SFEs X \$35.50 = \$1,170.61

**Sec. 23-149. - Sewer service rates.**

(a) *Generally.* Except as otherwise provided by contract, the monthly sewer service charge shall be as follows:

Size of Meter (inches)	In City	Out of City
5/8	\$6.00	\$10.20
1	6.00	10.20
1½	6.00	10.20
2	9.60	16.32
3	19.20	32.64
4	30.00	51.00
6	60.00	102.00
8	96.00	163.20
10	150.00	255.00

Monthly Water Use (cubic feet)	Monthly Sewer Service Charge	
	In City	Out of City
Each 100 cubic feet	2.90	4.93

(b) *Consumers using water cooling towers for air conditioning.* Consumers using water cooling towers for air conditioning systems shall be given a credit of 30 cubic feet per ton per month during the service periods commencing in the months of April through October. The minimum charge shall be:

Size of Meter (inches)	In City	Out of City
5/8	\$9.73	\$12.37
1	13.72	18.11
1½	17.70	23.85
2	25.66	35.31
3	41.59	58.25
4	73.44	104.13
6	153.06	218.84
8	216.75	310.60
10	477.50	686.26

- (c) *Limitation on charge on single-family residences.* Maximum sewer charge on single-family residences during the service periods commencing in the months of April through October will be 1,400 cubic feet.
- (d) *Apartments and trailer parks.* Sewer rates for apartment buildings and trailer parks shall be the base rate of a single-family residence per dwelling unit plus a base fee based on meter connection size plus the rate per 100 cubic feet as reflected by water consumption.
- (e) *Hotels, motels, dormitories and roominghouses.* Sewer rates for hotels, motels, dormitories and roominghouses shall be one-half the base rate of a single-family residence per room plus a base fee based on meter connection size plus the rate per 100 cubic feet as reflected by water consumption.
- (f) *Contaminated groundwater.* Separate meters for discharges of contaminated groundwater are required. In city or out of city customers discharging contaminated ground water shall pay the out of city base monthly sewer service charge times one and one-half plus the out of city monthly sewer service charge for each 100 cubic feet times one and one-half.

(Code 1979, § 5-4005; Ord. No. 94-27 6-8-94; Ord. No. 97-57, 9-17-97; Ord. No. 98-40, 6-17-98; Ord. No. 2000-042, 6-19-00; Ord. No. 2000-063, 9-6-00; Ord. No. 2005-057, 6-22-05; Ord. No. 2006-046, 11-8-06; Ord. No. 2007-044, 6-27-07; Ord. No. 2008-039, 6-18-08; Ord. No. 2010-089, 6-23-10; Ord. No. 2011-027, 6-21-11; Ord. No. 2012-050, 6-26-12; Ord. No. 2012-077, 8-21-12; Ord. No. 2012-099, 10-16-12)

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Each 100 cubic feet	\$3.13	\$5.32

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